

ERIC A. LIEPINS
ERIC A. LIEPINS, P.C.
12770 Coit Road, Suite 850
Dallas, Texas 75251
(972) 991-5591
(972) 991-5788 - Telefax

Attorney for Debtor

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

IN RE §
§
TROPHY HOSPITALITY, LLC. § Case no. 21-40512-11
§
DEBTOR §

AMENDED JOINT MOTION FOR APPROVAL OF AGREEMENT PURSUANT TO
BANKRUPTCY RULE 4001(d)

**NO HEARING WILL BE CONDUCTED HEREIN UNLESS A WRITTEN
RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES
BANKRUPTCY COURT, 660 NORTH CENTRAL EXPRESSWAY, 3RD FLOOR,
PLANO, TEXAS 75074, BEFORE 5:00 O'CLOCK P.M., ON
JULY 21, 2017, WHICH IS FOURTEEN (14) DAYS FROM THE
DATE OF SERVICE HEREOF.**

**ANY RESPONSE MUST BE IN WRITING AND FILED WITH THE
CLERK. A COPY MUST BE SERVED UPON COUNSEL FOR THE
MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH
HEREIN. IF A RESPONSE IS FILED, A HEARING WILL BE
HELD WITH NOTICE ONLY TO THE OBJECTING PARTY.**

**IF NO HEARING ON SUCH NOTICE OR MOTION IS TIMELY
REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO
BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER
GRANTING THE RELIEF SOUGHT OR THE NOTICED ACTION MAY
BE TAKEN.**

TO THE HONORABLE U.S. BANKRUPTCY JUDGE BRENDA T. RHOADES:

COMES NOW, Trophy Hospitality, LLC (“Debtor”) and the Blue Star Frisco Retail, LLC (“Blue Star”) and files this their Joint Motion for Approval of Stipulation Assuming Lease and Resolving Motion for Relief Pursuant to Bankruptcy Rule 4001(d) and in support thereof, would respectfully show unto the Court as follows:

1. Debtor filed this case under Chapter 11 on April 8, 2021.
2. The Debtor and Blue Star have reached an Agreement for the Debtor’s Assumption of its Lease with Blue Star and Resolving Pending Motion for Relief. The Agreement is in the form of a Joint Stipulation and is attached hereto as Exhibit A.
3. Pursuant to Bankruptcy Rule 4001(d) you have 14 days to Object to the entry of the attached Agreement.

WHEREFORE, PREMISES CONSIDERED, the Debtors and Blue Star respectfully request the Court approve this Joint Motion and for such other and further relief, in law or equity, to which they may show themselves justly entitled.

Respectfully submitted,

Eric A. Liepins
Eric A. Liepins, P.C.
12770 Coit Road, Suite 850
Dallas, Texas 75251
(972) 991-5591
(972) 991-5788 - Fax

/s/ Eric Liepins
ERIC A. LIEPINS, SBN 12338110

ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing Motion was forwarded to U. S. Trustee, all those persons requesting notice, and all creditors of the estate, via U.S. Mail, this 7th day of July 2021.

/s/ Eric Liepins
ERIC A. LIEPINS